

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA**  
Harrisonburg Division

ASHLEY ADAMS,

*Plaintiff,*

v.

Case No.: 5:21-cv-00006-TTC

ROCKINGHAM COUNTY,

*Defendant.*

**PLAINTIFF’S MOTION TO REFER CASE TO MEDIATION**

COMES NOW Plaintiff, Ashley Adams, by and through her undersigned counsel, and respectfully moves that this matter be referred to mediation before a Magistrate Judge. Pursuant to Local Rule 83, Plaintiff’s counsel conferred with Defendant’s counsel regarding having this matter referred to mediation with a Magistrate Judge in the hope that the parties can resolve their dispute at this early stage of the proceedings. Defendant’s counsel stated that she had to confer with her client before agreeing to a joint request to mediate. The parties agreed that if Defendant’s counsel had not contacted Plaintiff’s counsel by April 26, 2021 that Plaintiff would file her motion to refer this matter to a Magistrate Judge for purposes of mediation. Additionally, pursuant to the Court’s Scheduling Order [Doc. 18], Section II, ¶ 1, “[t]he court encourages the parties to engage in settlement discussions. Upon motion of any party, the court will refer the case to a magistrate judge for mediation.”

WHEREFORE, Plaintiff respectfully requests that the Court assign a magistrate to act as the neutral and provide dates of availability to the parties for the scheduling of a settlement conference.

Dated: April 29, 2021

Respectfully Submitted,

/s/ Joanne Dekker

Joanne Dekker

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*Counsel for Plaintiff, Ashley Adams*

### **LOCAL RULE 11 CERTIFICATION**

Plaintiff's counsel hereby certifies that counsel for the parties discussed the submission of this Motion without a hearing.

/s/ Joanne Dekker

Joanne Dekker

**CERTIFICATE OF SERVICE**

I hereby certify that on April 29, 2021, I have electronically filed this document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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*Attorneys for Defendant, Rockingham County*

/s/Joanne Dekker  
Joanne Dekker, Esq.